



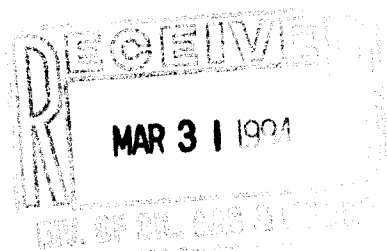
# State of Utah

DEPARTMENT OF NATURAL RESOURCES  
DIVISION OF WILDLIFE RESOURCES

T/015/032  
#2

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March 28, 1994

Mark Bailey, Area Manager  
Bureau of Land Management  
Price River Resource Area  
900 North 700 East  
Price, Utah 84501

Attn: Mark Mackiewicz

Dear Mark:

The Utah Division of Wildlife Resources has reviewed the Environmental Assessment for Genwall Coal Company Bald Ridge Loadout Facility (Fonsi No. UT-066-94-12). We were involved in the planning stages of this project and assisted with a raptor survey of the proposed site. Our comments at that time, dated December 14, 1993, are included in Appendix G. We hope that you will continue to address those concerns.

Our main concerns involve impacts to wintering big game and raptors. Construction of the site will result in a direct loss of 145 acres of critical deer and elk winter range. Mitigation measures listed on page 50 of the EA call for either treatment to enhance 145 acres of winter range, or the purchase of 112 AUM's in the Mohrland Allotment. As stated in our earlier letter, we do not feel a 1 acre:1 acre enhancement project is sufficient. The entire area is now used by wintering big game, and a certain portion of these animals will be displaced by the project. A habitat enhancement project nearby will just serve to pull more animals into an area occupied by others. For this reason, we recommended that enhancement projects should be done on 3:1 ratio. We do not feel that the purchase of 112 AUM's will mitigate lost habitat as well, unless all AUM's in the allotment are purchased and the trail right through the allotment is suspended. Our experience has been that a significant amount of forage can be removed from the allotment by livestock taken through the allotment on a trail permit.

If the trail permit cannot be suspended we would prefer mitigation to purchase private inholdings in the Gordon Creek Wildlife Management Area. This would allow the Division to intensively manage an area for wildlife, particularly big game, and increase the carrying capacity of the winter range to a sufficient level to offset losses at Bald Ridge.



Mark Bailey

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March 18, 1994

We are also concerned about increased truck traffic on the winter range. This will result in a significant number of deer, eagles, and other wildlife being killed on the road. The Assessment stated that truck traffic will increase 350%, running 130 trucks per day, or 260 trips per day, through 6.2 miles of critical winter range. In order to reduce this problem, we recommend that from November 1 to April 15 each year, all trucks be restricted to 35 mph from the second cattle guard on the Mohrland Road to the load out. This must be part of the permit and strictly adhered to. We recommend that the BLM doing unscheduled random samples at least monthly to document compliance. If found in violation, the permittee would then be required to fence the road or provide other suitable mitigation. When deer are killed on the road, the BLM should require the permittee to remove the carcass at least 50 feet from the road immediately. This will significantly reduce the chances of eagles or other raptors being struck by vehicles.

We appreciate the opportunity to comment on this EA. Hopefully, we can work together to resolve potential impacts and make this work smoothly for all parties involved. If you have questions about our comments, please contact Bill Bates of our office.

Sincerely,



Miles Moretti,  
Regional Supervisor

BB/j

copy: Ralph Miles, DWR  
Paul Baker, DOGM